

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:22-cv-203-JRG
	)	
MICRON TECHNOLOGY, INC.; MICRON	)	JURY TRIAL DEMANDED
SEMICONDUCTOR PRODUCTS, INC.;	)	
MICRON TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	
	)	

---

**JOINT MOTION TO EXTEND DEADLINES**

Plaintiff Netlist, Inc. (“Netlist”) and Defendants Micron Technology, Inc.; Micron Semiconductor Products, Inc.; Micron Technology Texas LLC (collectively “Micron”) respectfully jointly move to extend the deadlines for the parties to file proposed Docket Control Order, Discovery Order, and Protective Order and to exchange Initial and Additional Disclosures. The parties request that the deadlines be extended by seven (7) days as follows:

Events	Current Deadline	Requested Extended Deadline
File Proposed Docket Control Order and Discovery Order	October 11, 2022	October 18, 2022
File Proposed Protective Order and Comply with Paragraphs 1 & 3 of the Discovery Order	October 17, 2022	October 24, 2022

This request is supported by good cause because the parties have been and wish to continue discussing each side’s proposals, with the hope of resolving disputes and narrowing the issues that may need to be presented to the Court. No party seeks this extension for purposes of delay. A proposed order is attached.

Dated: October 11, 2022

Respectfully submitted,

/s/ Samuel F. Baxter

Samuel F. Baxter  
Texas State Bar No. 01938000  
[sbaxter@mckoolsmith.com](mailto:sbaxter@mckoolsmith.com)  
Jennifer L. Truelove  
Texas State Bar No. 24012906  
[jtruelove@mckoolsmith.com](mailto:jtruelove@mckoolsmith.com)  
**MCKOOL SMITH, P.C.**  
104 East Houston Street Suite 300  
Marshall, TX 75670  
Telephone: (903) 923-9000  
Facsimile: (903) 923-9099

Jason G. Sheasby (*pro hac vice*)  
[jsheasby@irell.com](mailto:jsheasby@irell.com)  
Annita Zhong, Ph.D. (*pro hac vice*)  
[hzhong@irell.com](mailto:hzhong@irell.com)  
Thomas C. Werner (*pro hac vice*)  
[twerner@irell.com](mailto:twerner@irell.com)  
Yanan Zhao (*pro hac vice*)  
[yzhao@irell.com](mailto:yzhao@irell.com)  
Michael W. Tezyan (*pro hac vice*)  
[mtezyan@irell.com](mailto:mtezyan@irell.com)

**IRELL & MANELLA LLP**  
1800 Avenue of the Stars, Suite 900  
Los Angeles, CA 90067  
Tel. (310) 277-1010  
Fax (310) 203-7199

*Attorneys for Plaintiff Netlist, Inc.*

By: /s/ Michael R. Rueckheim

Thomas M. Melsheimer  
State Bar No. 13922550  
[TMelsheimer@winston.com](mailto:TMelsheimer@winston.com)  
Natalie Arbaugh  
State Bar No. 24033378  
[NArbaugh@winston.com](mailto:NArbaugh@winston.com)  
Barry K. Shelton

State Bar No. 24055029  
BShelton@winston.com  
WINSTON & STRAWN LLP  
2121 N. Pearl Street, Suite 900  
Dallas, TX 75201  
Telephone: (214) 453-6500  
Facsimile: (214) 453-6400

Michael R. Rueckheim  
State Bar No. 24081129  
MRueckheim@winston.com  
WINSTON & STRAWN LLP  
255 Shoreline Drive, Suite 520  
Redwood City, CA 94065  
Telephone: (650) 858-6500  
Facsimile: (650) 858-6559

Matthew Hopkins  
*Pro Hac Vice*  
State Bar No. 1500598  
MHopkins@winston.com  
WINSTON & STRAWN LLP  
1901 L Street, N.W.  
Washington, D.C. 20036-3506  
Telephone: (202) 282-5000  
Facsimile: (202) 282-5100

Juan C. Yaquian  
*Pro Hac Vice*  
State Bar No. 24110559  
JYYaquian@winston.com  
WINSTON & STRAWN LLP  
800 Capital Street, Suite 2400  
Houston, TX 77002-2925  
Telephone: (713) 651-2600  
Facsimile: (713) 651-2700

Wesley Hill  
State Bar No. 24032294  
Andrea Fair  
State Bar No. 24078488  
Charles Everingham IV  
State Bar No. 00787447  
WARD, SMITH & HILL, PLLC  
P.O. Box 1231  
Longview, Texas 75606-1231  
Telephone: (903) 757-6400  
Facsimile: (903) 757-2323

Email: wh@wsfirm.com  
andrea@wsfirm.com  
ce@wsfirm.com

**Attorneys for Defendants  
Micron Technology, Inc.,  
Micron Semiconductor Products,  
Inc., and Micron Technology Texas,  
LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on all counsel of record by email on this 11th day of October, 2022.

*/s/ Jennifer L. Truelove*  
Jennifer L. Truelove

**CERTIFICATE OF CONFERENCE**

The undersigned hereby that the relief requested in this motion is unopposed.

*/s/ Jennifer L. Truelove*  
Jennifer L. Truelove